

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS

IN RE:) BANKRUPTCY CASE
)
LAURA MARIE MARTIN,) NO.: 18-02778
)
Debtor,) CHAPTER 7
)
) JUDGE: TIMOTHY A. BARNES
)

NOTICE OF MOTION

TO: SEE ATTACHED ADDRESSES

PLEASE TAKE NOTICE THAT ON February 27, 2018 at 10:00 am, or as soon thereafter as counsel may be heard, I shall appear before the Honorable Timothy A. Barnes, U.S. Bankruptcy Judge, 219 S. Dearborn St., Chicago, Illinois 60604, room 744, and shall then and there present the attached Motion and at which time you may appear if you so desire.

CERTIFICATION

I, the undersigned Attorney, Certify that I served a copy of this Notice to the Addresses attached by electronic notice through ECF or by depositing the same at the U.S. Mail at 1 North Dearborn, Chicago, Illinois 60602 at 5:00 P.M. on February 16, 2018, with proper postage prepaid.

McCalla Raymer Leibert
Pierce, LLC

Toni Townsend

/s/Toni Townsend
ARDC# 6289370

1 N. Dearborn Suite 1200
Chicago, IL 60602
(312) 346-9088

**Pierce & Associates, P.C. and McCalla Raymer, LLC combined Firms to form the
Firm McCalla Raymer Pierce, LLC.**

**This is an attempt to collect a debt and any information obtained will be used for
that purpose.**

NOTICE OF MOTION ADDRESSES

To Trustee:
Eugene Crane
135 S. LaSalle
Suite 3705
Chicago, IL 60603

by Electronic Notice through ECF

To Debtor:
Laura Marie Martin
3737 W 57TH PL
Chicago, IL 60629

Served via U.S. Mail

To Attorney:
David D. Lugardo
Geraci Law L.L.C.
55 East Monroe Street Suite #3400
Chicago, IL 60603

by Electronic Notice through ECF

McCalla Raymer Leibert Pierce, LLC
Attorney For: Creditor
1 N. Dearborn Suite 1200
Chicago, IL 60602
(312) 346-9088
File No. BK-008042-18

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS

IN RE:) BANKRUPTCY CASE
)
LAURA MARIE MARTIN) NO.: 18-02778
<i>fka</i> LAURA STRAFACI ,)
) CHAPTER 7
Debtor,)
) JUDGE: TIMOTHY A. BARNES
)

MOTION TO MODIFY THE AUTOMATIC STAY

NOW COMES Federal National Mortgage Association ("Fannie Mae"), as Creditor in c/o Seterus, Inc. by and through its attorneys, McCalla Raymer Leibert Pierce, LLC, and requests that the Automatic Stay heretofore entered on the property located at 3737 W 57th Pl, Chicago, Illinois 60629 be Modified stating as follows:

1. On January 31, 2018, the above captioned Chapter 7 was filed.
2. Federal National Mortgage Association ("Fannie Mae"), as Creditor in c/o Seterus, Inc. services the first mortgage lien on the property located at 3737 W 57th Pl, Chicago, Illinois 60629.
3. The debt is based on a April 09, 2007, Mortgage and Note in the original sum of \$140,000.00.
4. As of February 8, 2018 the funds necessary to pay off Federal National Mortgage Association ("Fannie Mae"), as Creditor in c/o Seterus, Inc. on the above captioned account were approximately \$125,630.90. Additional interest advances and charges may have accrued under the security instrument through the presentment of this motion. The Debtor's schedules list the fair market value of said property at \$150,000.00.

5. The account is currently due and owing to Federal National Mortgage Association ("Fannie Mae"), as Creditor in c/o Seterus, Inc. for the July 2017 current mortgage payment and those thereafter, plus reasonable attorney fees and costs.
6. The Debtor has no equity in the property located at 3737 W 57th Pl, Chicago, Illinois 60629 for the benefit of unsecured creditors.
7. Federal National Mortgage Association ("Fannie Mae"), as Creditor in c/o Seterus, Inc. continues to be injured each day it remains bound by the Automatic Stay.
8. Federal National Mortgage Association ("Fannie Mae"), as Creditor in c/o Seterus, Inc. is not adequately protected.
9. The property located at 3737 W 57th Pl, Chicago, Illinois 60629 is not necessary for the Debtor's reorganization.
10. No cause exists to delay the enforcement and implementation of relief and Bankruptcy Rule 4001(a)(3) should be waived.

WHEREFORE, YOUR MOVANT PRAYS that the Automatic Stay be modified and that Bankruptcy Rule 4001(a)(3) should be waived as not applicable, and such other relief as this Court deems just.

Federal National Mortgage Association
("Fannie Mae"), as Creditor in c/o Seterus,
Inc.

McCalla Raymer Leibert Pierce, LLC

By: /s/Toni Townsend

Toni Townsend
Illinois Bar No. 6289370
Attorney for Creditor
1 N. Dearborn Suite 1200
Chicago, IL 60602
Phone: (312) 346-9088
Fax: (312) 551-4400
Email: ILpleadings@mrpllc.com